



Airlines for America®

We Connect the World

March 17, 2022

Federal Aviation Administration
800 Independence Ave SW
Washington, D.C. 20591

**Re: Requests for Comments; Clearance of Renewal Approval of Information Collection:
2120–0776, Airspace Authorizations in Controlled Airspace**

Airlines for America (“A4A”)¹ appreciates the opportunity to provide these Comments in response to the Federal Aviation Administration’s (“FAA”) Request for Comments (“Notice”), which seeks renewed approval to authorize or deny the requested authorization of Unmanned Aircraft Systems (“UAS”) under 49 U.S.C. § 44809(a)(5)’s controlled airspace operation.

A4A respectfully submits these Comments in support of the requested information, because our Members have keen safety and security interests associated with the operation of small Unmanned Aircraft Systems (“sUAS”) in controlled airspace. Accordingly, A4A endorses the FAA’s proposal to collect information related to sUAS operation requests in controlled airspace, and to then utilize this information in furtherance of its regulatory approach toward the seamless integration of UAS operations in the National Airspace System (“NAS”). The proposal supports aviation safety through the FAA’s use of the collected information to clearly identify UAS operators and make determinations whether to authorize or deny the requested authorization of UAS operations each time a respondent requests an airspace authorization to operate a small UAS in controlled airspace.

The FAA must ensure adequate safety precautions are implemented prior to allowing integration of routine, UAS operations in controlled airspace. The goal is to prevent unmanned aircrafts collision with manned aviation. Preventing encroachment from occurring during a manned aircraft’s critical phases of flight is essential. Because of the scope of aviation operations within controlled airspace, these risks and the unique regulatory challenges must be addressed. It is, therefore, imperative to discern sUAS operators who are compliant with surveillance and operating requirements from those operators who are not. Given these concerns, the FAA’s

¹A4A Members include Alaska Airlines, Inc.; American Airlines, Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Continental Holdings, Inc.; and United Parcel Service Co. A4A’s Associate Member is Air Canada.

Notice seeking renewed approval for collecting information related to sUAS operation requests in controlled airspace both identifies and mitigates the risks associated with unmanned aircrafts.

Conclusively, it is within the FAA's purview to evaluate an unmanned aircraft's potential impact on public safety and national security. In this instance, authorizing or denying an sUAS operator's request in controlled airspace and gathering the data therewith facilitates the FAA's mission to maintain a safe and efficient national airspace.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andy Cebula". The signature is fluid and cursive, with a large initial "A" and a checkmark-like flourish.

Andy Cebula

AIRLINES FOR AMERICA

Vice President, NextGen and New Entrants
1275 Pennsylvania Avenue, NW, Ste. 1300
Washington, D.C. 20004